EXHIBIT H



U.S. Department of Justice

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

December 28, 2023

BY EMAIL

Lawrence Lustberg, Esq. (llustberg@gibbonslaw.com) Anne Collart, Esq. (acollart@gibbonslaw.com) Ricardo Solano, Jr. (rsolano@gibbonslaw.com)

Re: United States v. Wael Hana, S1 23 Cr. 490 (SHS)

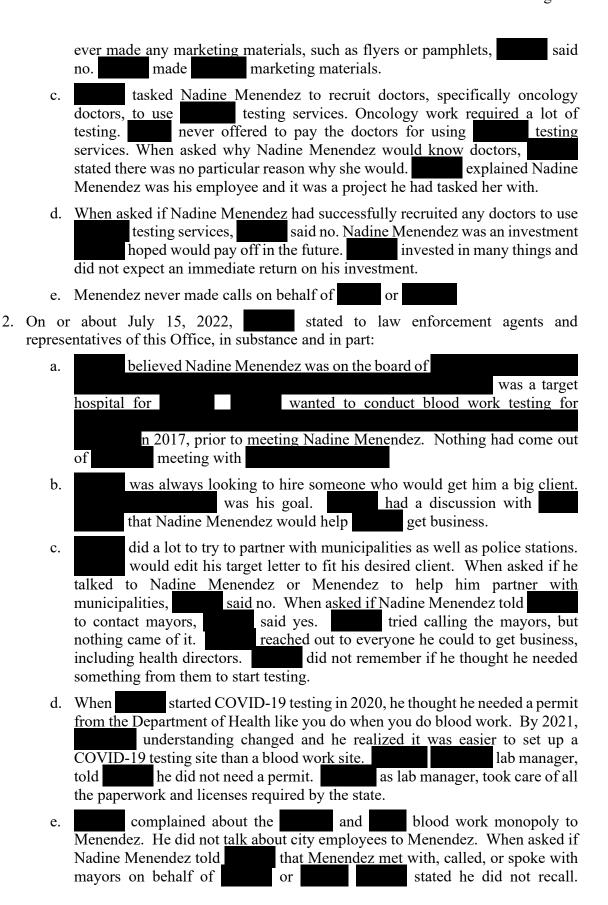
Dear Counsel:

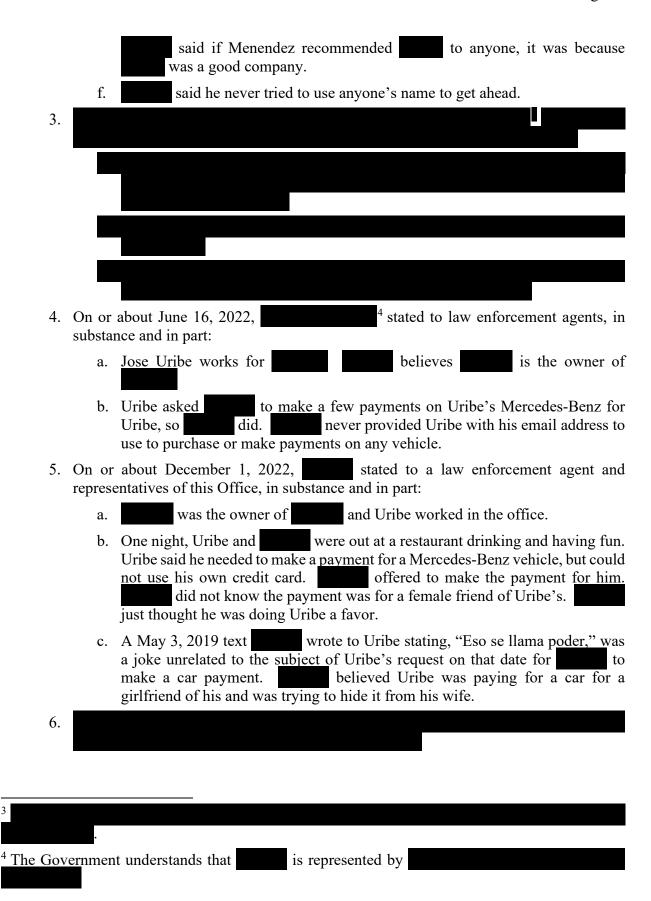
The Government writes to disclose certain information regarding certain potential witnesses in the above-captioned matter, to reiterate its request for reciprocal discovery, and to request material obtained via Rule 17(c) subpoenas. This disclosure should not be taken to indicate the Government necessarily believes that it has an obligation to disclose this information at this time, *see* 18 U.S.C. § 3500; Fed. R. Crim. P. 16(a)(2); rather, we make this disclosure as a courtesy and to assist you in preparing your defense. Nor should this letter be read as waiving the Government's right to decline to provide additional information regarding potential witnesses at this time. This letter and the information contained herein is designated as Attorney's Possession Only under the October 6, 2023 protective order entered by the Court.

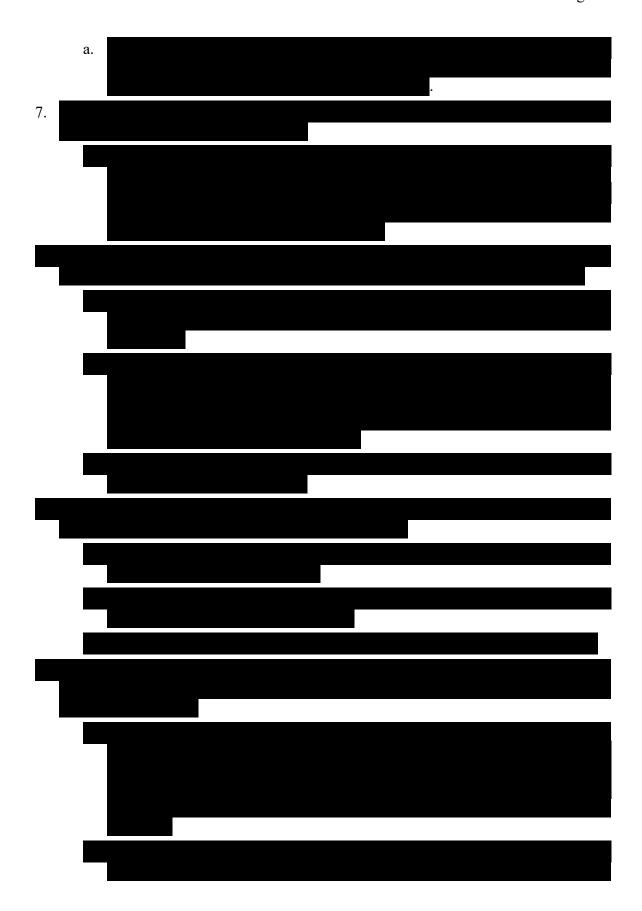
		tter and the information contained herein is designated as Attorney's Possession ctober 6, 2023 protective order entered by the Court.
1.		about June 16, 2022, 2 made the following statements to law ement agents, in substance and in part:
	a. 	asked Nadine Menendez to do marketing work for hired her because he liked her appearance. Nadine Menendez had no marketing experience or medical background. did not hire Nadine Menendez because of her relationship with her husband, Senator Robert Menendez ("Menendez").
	b.	When asked to describe what marketing services Nadine Menendez was providing for repeatedly said "marketing" and that Nadine Menendez would talk to people about When asked if Nadine Menendez
e a	menabl	e to discussing a specific timeline for the production of 3500 material as part of

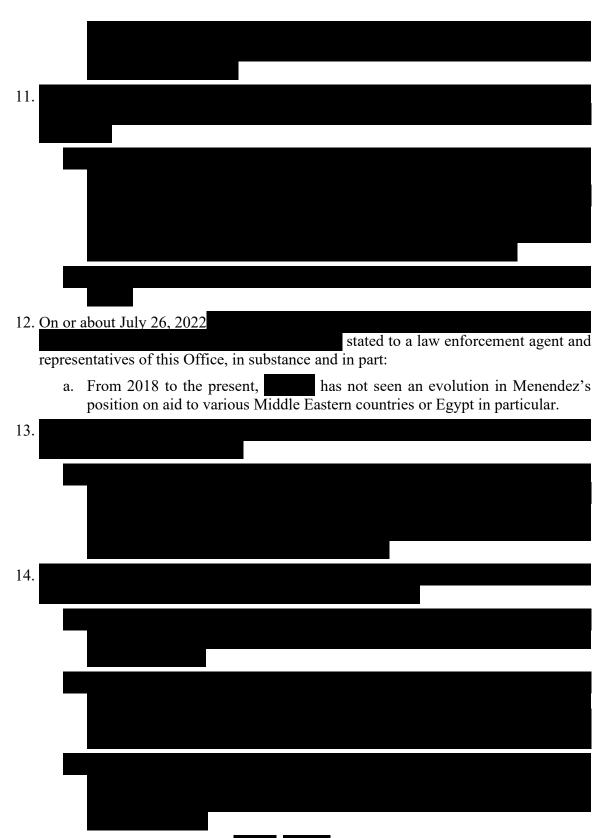
¹ We are amenable to discussing a specific timeline for the production of 3500 material as part of a mutual schedule for all pretrial and trial-related disclosures, including expert notice, Rule 26.2 material, a defense witness list, and defense exhibits.

² The Government understands that is represented by

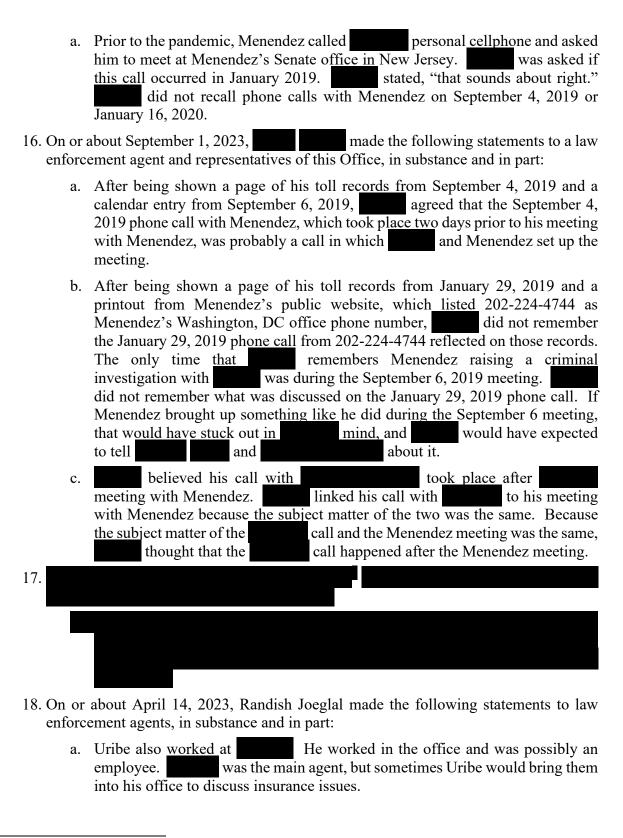




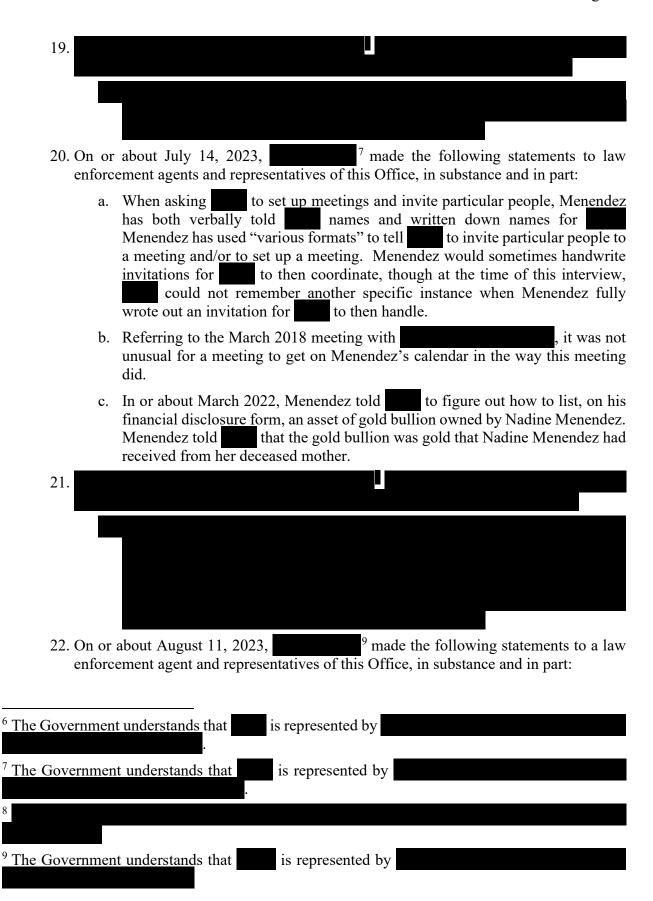


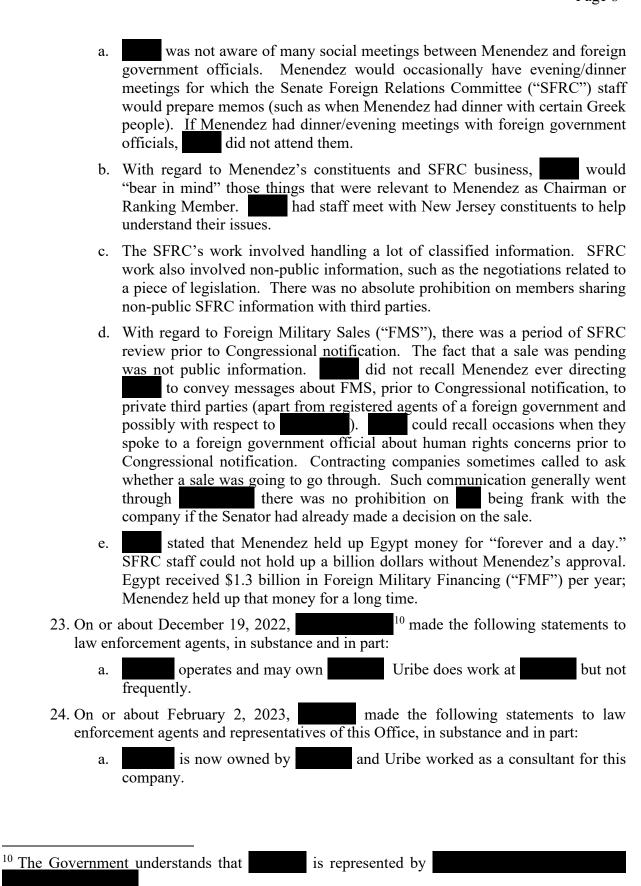


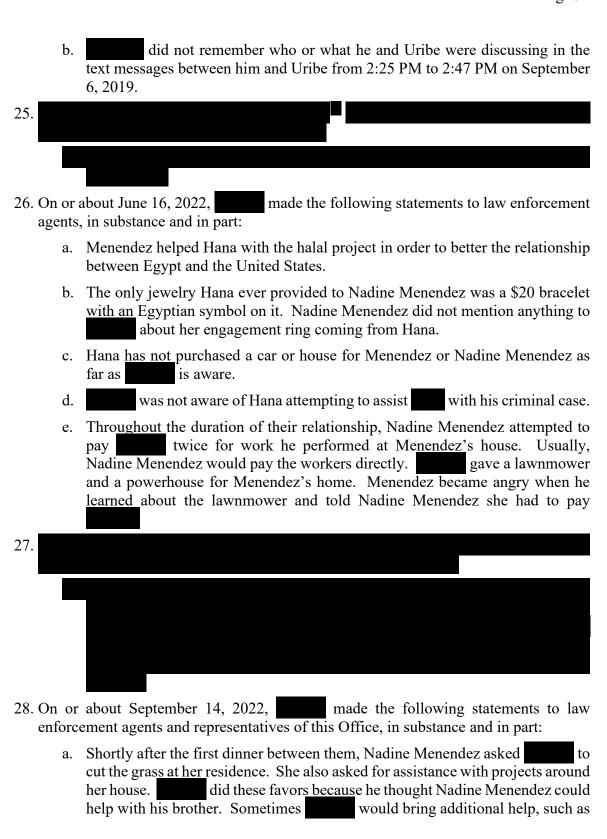
15. On or about June 22, 2022, made the following statements to law enforcement agents and representatives of this Office, in substance and in part:

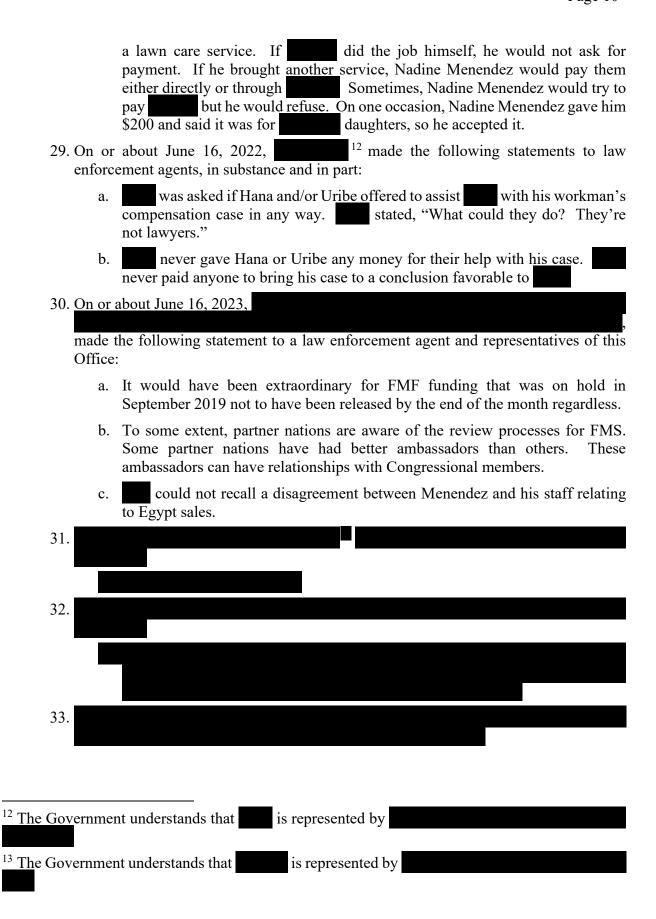


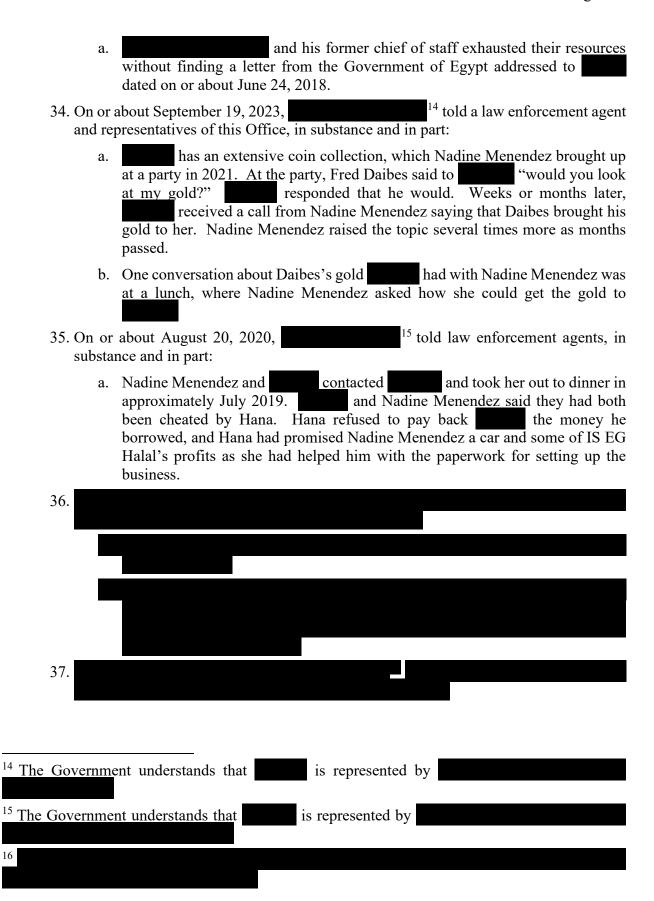
⁵ The Government understands that is represented by Robert Andalman, Esq., A & G Law LLC.

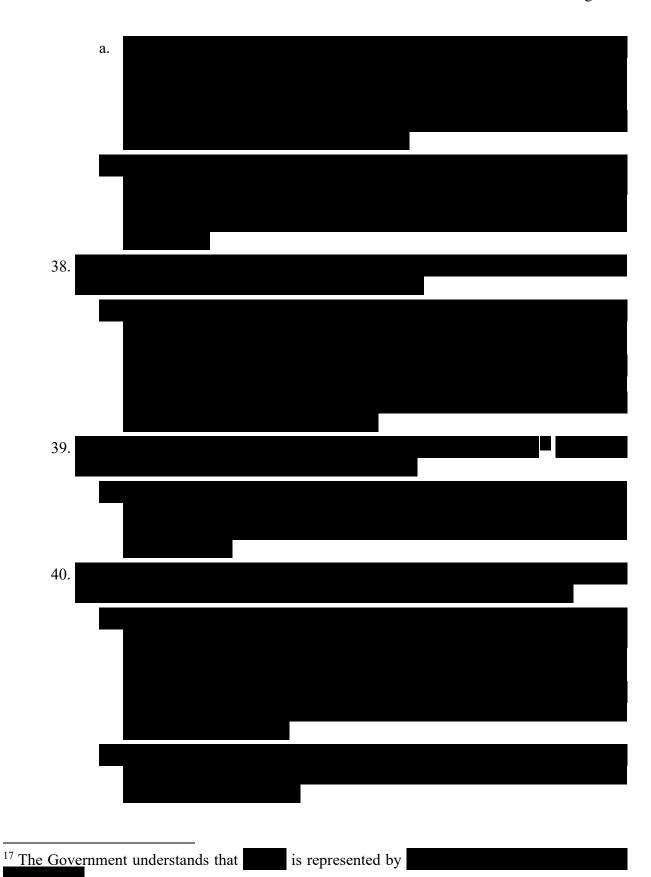














Separately, we note that we have not received any reciprocal discovery to date. We again renew our request for reciprocal disclosure from the defendant. Please confirm whether the defendant has, to date, met the defendant's respective reciprocal disclosure obligations under Rule 16(b). See Fed. R. Crim. P. 16(b)(1); see also, e.g., United States v. Rajaratnam, No. 09 Cr. 1184 (RJH), 2011 WL 723530, at *5 (S.D.N.Y. Feb. 25, 2011). Please also confirm whether the defendant recognizes that such obligations are continuing ones.

Finally, we request material obtained pursuant to Rule 17(c) subpoenas. *See* Fed. R. Crim. P. 17(c)(1); *see also, e.g., United States v. Sellers*, 275 F.R.D. 620, 625 (D. Nev. 2011); *United States v. Reyes*, 162 F.R.D. 468, 470 (S.D.N.Y. 1995). So that we may seek relief from the Court if warranted, please advise us as to whether you have received any such material, and if you have not, whether you agree to produce any such material that you receive in the future.

As always, the Government remains available to confer at your convenience regarding discovery or the case generally.

Very truly yours,

DAMIAN WILLIAMS United States Attorney

By: s/ Paul M. Monteleoni

Eli J. Mark

Daniel C. Richenthal Paul M. Monteleoni Lara Pomerantz

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